

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
Houston Division**

CHRISTOPHER WILLIAMS, ET AL
Plaintiffs,

VS.

Case No. _____

TREND SERVICES, INC.
Defendant

NOTICE OF REMOVAL OF CIVIL ACTION

Defendant, TREND SERVICES, INC. ("Trend"), files this Notice of Removal of Civil Action brought by Plaintiff, CHRISTOPHER WILLIAMS. The grounds in support of this Notice of Removal are as follows:

1. Plaintiff instituted a civil action on October 25, 2012 against Trend in the 272nd Judicial District Court, Brazos County, Texas, Case No. 12-002936-cv-272 (the "State Court Action").
2. Trend was served or otherwise received a copy of the Original Petition on December 10, 2012.
3. From the allegations of the Original Petition, it appears that Plaintiff's claims arise under one or more laws of the United States. In particular, Plaintiff raises claims under the Fair Labor Standards Act, 29 U.S.C. §201, *et. seq.*
4. Thus, this Court has original jurisdiction over this cause of action pursuant to 28 U.S.C. §1331, and removal of this action to this Court is proper under 28 U.S.C. §1441(a).

5. Further, venue is proper in the United States District Court for the Southern District of Texas, Houston Division, pursuant to 28 U.S.C. §1391 and Local Rule 81, Rules of the United States District Court, Southern District of Texas.

6. Trend has given written notice of the filing of this Notice of Removal to the Plaintiff and has filed a copy of this Notice of Removal with the Clerk of Court of the 272nd Judicial District for Brazos County, Texas.

7. Pursuant to Local Rule 81, copies of all executed process, pleadings asserting causes of action, and orders signed by the state judge and other papers filed in the State Court Action, together with the docket sheet, index of matters being filed and list of all counsel are attached to this Notice.

WHEREFORE, Defendant, TREND SERVICES, INC., respectfully requests that this action proceed in this Court as an action properly removed pursuant to 28 U.S.C. §§1441 and 1446.

Respectfully Submitted,

GIBSON~GRUENERT, PLLC

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**ATTORNEYS FOR DEFENDANT
TREND SERVICES, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing Defendant, Trend Services, Inc., Notice of Removal was filed electronically with the Clerk of Court using the CM/ECF system. Said document has this date been served on all counsel of record in these proceedings by:

() CM-ECF () Hand Delivery () Prepaid U.S. Mail ☒ Facsimile

SIGNED this 4th day of January, 2013.

/s/Jason B. Boudreaux
Jason B. Boudreaux